

STATE OF CALIFORNIA

DELTA PROTECTION COMMISSION

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98-148



August 26, 1998

To: CALFED Bay-Delta Program

Attention: Judy A. Kelly, Deputy Director
Stein Buer, Program Manager

From: Margit Aramburu, Executive Director

Subject: Developing a Draft Preferred Program Alternative (Draft)

I am writing in response to the above-named document. The Delta Protection Commission has not had the opportunity to review the document, so these are staff comments only.

Pages 22-24 describe the Stage I implementation of the Ecosystem Restoration Program Plan. Item #4 states "Restore three major habitat corridors in the Delta (Yolo Bypass, Mokelumne, and San Joaquin-approximately 25,000 acres) with a mosaic of habitat types to improve ecological function and facilitate recovery of endangered species" and Item #15 states "Explore ways to provide incremental improvements in ecosystem values throughout the Bay-Delta system in addition to habitat corridors described above; e.g., pursue actions that are opportunity-based (willing sellers, funding, permitting, etc), provide incremental improvements on private land through incentives, develop partnerships with farmers on "environmentally friendly" agricultural practices, etc."

The Delta Protection Commission adopted and forwarded to CALFED a comment letter on the Draft ERPP and on the Draft Environmental Impact Report, which included a revised ERPP. Those comments recommend that the highest priority for habitat enhancement and/or restoration should be: Delta islands and tracts currently in public and/or nonprofit ownership; currently flooded lands in public or private ownership; in-channel islands and waterside berms; uplands areas already in public or nonprofit ownership; enhanced management of private agricultural lands (wildlife friendly agriculture; and enhanced management of privately-owned lands managed for wildlife habitat, such as duck clubs and upland hunting clubs. The Commission recommends that the Stage 1 actions be revised to reflect the Commission's comments.

Pages 27- 29 describes the actions and time lines for the three conveyance alternatives. The primary concern with the Draft is the short time period allotted for construction and

implementation of a Through Delta alternative (Alternative 2) prior to determining the need for a "dual conveyance facility" (Alternative 3). It seems premature to carry out all environmental documentation, field and pilot studies, and feasibility studies for an Isolated Facility in years 1-7 at the same time the North and South Delta improvements will be planned and designed; construction of North Delta Improvements are not scheduled until Year 7. There needs to be adequate time to design, permit, and construct all or at least most of the total CALFED program improvements to evaluate the effectiveness of the Through Delta Alternative. These would include: water quality, water transfer, water use efficiency, levee and channel projects, storage, and ecosystem program improvements. In addition, there are pressing needs in the North Delta for early implementation of flood control solutions that should be designed and constructed with design of conveyance and ecosystem restoration projects.

Thank you for considering these comments.

cc: Chairman Patrick N. McCarty